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SENTIUS INTERNATIONAL, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ZOHO CORPORATION,

Plaintiff,

v.

SENTIUS INTERNATIONAL, LLC

Defendant.

CASE NO. 4:19-cv-00001-YGR

**DECLARATION OF ROBERT J. YORIO IN
SUPPORT OF DEFENDANT AND
COUNTERCLAIMANT SENTIUS
INTERNATIONAL LLC'S ADMINISTRATIVE
REQUEST PURSUANT TO CIVIL LOCAL
RULE 7-11 TO EXCEED PAGE LIMITATIONS
GOVERNING BOTH PARTIES' CLAIM
CONSTRUCTION REPLY BRIEFS**

SENTIUS INTERNATIONAL, LLC,

Counterclaimant,

v.

ZOHO CORPORATION and ZOHO
CORPORATION PVT., LTD.
Counter-Defendants.

DATE: March 18, 2020
TIME: 9:30 a.m.
COURTROOM: 1
JUDGE: Honorable Yvonne Gonzalez Rogers

1 I, Robert J. Yorio, declare:

2 1. I am one of the attorneys of record for Defendant and Counterclaimant, Sentius
3 International, LLC (“Sentius”) in this action. I have prepared this declaration in support of
4 Defendant and Counterclaimant, Sentius International, LLC’s (“Sentius”) Administrative
5 Request Pursuant to Civil Local Rule 7-11 to exceed page limitations governing both parties
6 Claim Construction Reply Briefs. The following facts and documents set out herein are within
7 my knowledge, and if called as a witness to testify herein, I could and would competently testify
8 to the truth thereto.

9 1. There are ten (10) terms proposed for construction covering two (2) patents as set
10 forth in the parties’ Joint Claim Construction Chart attached as Appendix B to the Joint Claim
11 Construction and Prehearing Statement filed on January 6, 2020 (Dkt. 49-1). The Reply Brief
12 will address all ten (10) terms across both patents and the intrinsic and extrinsic evidence
13 applicable to each term. This technical analysis will be accompanied by a discussion of the
14 application of a number of patent law principles to the construction of the claim terms. The
15 combination of Sentius’ factual analysis and legal argument will cause its Reply Brief to exceed
16 the 15-page limit set forth in Civil Local Rule 7-4(b).

17 2. On February 20, 2020, I conferred with Ryan Marton, Lead Counsel for Zoho
18 about the subject matter of this Motion. He gave his consent to our request to increase the page
19 limitation applicable to the Reply Briefs from 15 pages to 19 pages. I proposed that the increased
20 page limits apply to both sides and Mr. Marton agreed.

21 3. The parties agreed to a Stipulation and (Proposed Order) that sets forth this
22 agreement and accompanies the Administrative Motion.

23
24 I declare under penalty of perjury under the laws of the United States that the foregoing is
25 true and correct.

26 Executed on this 20th day of February 2020 at Menlo Park, CA.

27 /s/ Robert J. Yorio
28 ROBERT J. YORIO